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PLEASE RESPOND TO WOODCLIFF LAKE OFFICE

June 4, 2021

VIA CM/ECF

Hon. Sanket J. Bulsara, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: Gregory Carbajal Casas v. Rudolph Brewer, Jr.
and Virginia Transportation Corp.
U.S. District Court – EDNY Civil Action # 1:21-cv-01902
Our File No. 30234**

Dear Judge Bulsara:

We represent defendants, Virginia Transportation Corp. and Rudolph Brewer, Jr. in connection with the above referenced matter.

This letter is respectfully submitted to Your Honor in connection with the Court's June 4, 2021 Text Order. As the Court is aware, we set forth the procedural history in our April 8, 2021 Removal Petition [Docket Entry No.: 1]. In our Removal Petition, at paragraph 19, we identified that we contemporaneously served a Demand for Admission on Plaintiff's counsel to once and for all confirm the amount in dispute exceeds \$75,000.00.

For the Court's information and ease of reference, we respectfully submit the attached response to the Demand for Admission confirming the Plaintiff is seeking damages in this case in excess of \$75,000.00. Please see attached response to Demand for Admission.

Of course, we realize the Court prefers that discovery responses are not to be filed. We beg the Court's pardon in that regard inasmuch as we thought

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the Court may want to be made aware of the aforementioned response to the Demand for Admission. This way, the Court can have the benefit of all of the information as the Court renders its decision in furtherance of the June 4, 2021 Text Order.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

PRICE MEESE SHULMAN & D'ARMINIO, P.C.

/s/ Thomas C. Martin

Thomas C. Martin

WDB/TCM/eh
Enclosure

cc: Hon. Diane Gujarati, U.S.D.J. (w/encl.)

Herbert Rodriguez, Jr., Esq. (w/encl.)
Schwartz Goldstone Campisi & Kates, LLP
90 Broad Street, Suite 403
New York, NY 10004
Attorneys for Plaintiff,
Gregory Carbajal Casas

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

GREGORY CARBAJAL CASAS,

Plaintiff,

v.

RUDOLPH BREWER, JR. and
VIRGINIA TRANSPORTATION,
CORP.

Defendants.

Civil Action No.: 1:21-cv-1902

**DEFENDANTS' FIRST DEMAND
FOR ADMISSION PROPOUNDED
ON PLAINTIFF**

TO: Joseph Campisi, Esq.
Schwartz Goldstone Campisi & Kates, LLP
90 Broad Street
Suite 403
New York, New York 10004
Attorneys for Plaintiff,
Gregory Carbajal Casas.

Counsel:

PLEASE TAKE NOTICE that the undersigned, Price, Meese, Shulman & D'Arminio, P.C., attorneys for Defendants, Rudolph Brewer, Jr. and Virginia Transportation Corp. hereby demand your client admit or deny the following pursuant to Fed. R. Civ. P. 36:

S/ Thomas C. Martin

Thomas C. Martin, Esq.

tmartin@pricemeese.com

PRICE, MEESE,

SHULMAN & D'ARMINIO, P.C.

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Attorneys for Defendants, Virginia

Transportation, Corp. and Rudolph Brewer, Jr.

Dated: April 8, 2021

**DEFENDANT'S FIRST DEMAND FOR ADMISSIONS UPON
PLAINTIFF PURSUANT TO FED. R. CIV. P. 36.**

1. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs

Admit X

Deny _____

CERTIFICATION

I hereby certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

DATED: 5/10/2021

BY: _____

[sign]

Gregory Carbajal
[print name]

SONIA M. FERNANDEZ
Commissioner of Deeds
City of New York
No. 2-9996

Certificate Filed in Kings County
Commission Expires June 01, 2021

Sonia Fernandez